

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

TARA LYNCH,

Plaintiff,

v.

HUNTER WARFIELD, INC.,

Defendant.

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Case No. 1:20-cv-930

DEFENDANT HUNTER WARFIELD, INC.'S NOTICE OF REMOVAL

Defendant Hunter Warfield, Inc. (“Defendant”) file this *Notice of Removal* of this action from the Justice Court Precinct 3, Place 1, Bexar County, Texas to the United States District Court for the Western District of Texas as follows:

1. Plaintiff Tara Lynch (“Plaintiff”) filed her *Original Complaint* on August 19, 2020, in the Justice Court Precinct 3, Place 1, Bexar County, Texas.
2. This is a civil action based on Plaintiff’s contentions that Defendant has violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* (the “FDCPA”).
3. Removal is proper because this case involves a federal question—alleged violations of the FDCPA. Therefore, the entire suit is removable under 28 U.S.C. §1441(a).
4. Removal is timely pursuant to 28 U.S.C. §1446(b) because Defendant has filed this Notice of Removal within 30 days of receipt of Plaintiff’s Original Complaint. Plaintiff served the Original Complaint upon Defendants on or around August 19, 2020.
5. Venue is proper in this district under 28 U.S.C. §1441(a) because the state court where the suit has been pending is located in this district.

6. Pursuant to 28 U.S.C. §1446(a) and Local Rule 4.02, copies of all process, pleadings, orders and other papers filed in this action and obtained by Defendants are attached hereto and marked as **Exhibit A** and incorporated herein by reference.

7. A copy of this Notice of Removal has been sent to Plaintiff and will be filed with the clerk of the Justice Court Precinct 3, Place 1, Bexar County, Texas.

For the above reasons, Defendant Hunter Warfield, Inc. requests that this Court assume full jurisdiction over the proceeding as provided by law.

Dated: September 9, 2020

Respectfully submitted,

/s/ Robbie Malone

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***COUNSEL FOR DEFENDANT HUNTER
WARFIELD, INC.***

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been forwarded to parties entitled to notice of the same via ECF, CMRRR, and/or Email on this 9th day of September, 2020.

By: /s/ Robbie Malone